

**U.S. Department of Justice**

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January 22, 2007

FILED ELECTRONICALLY

Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kamburowski v. Kidd,
No. CV-05-0953 (CBA) (RLM)

Dear Judge Mann:

Defendants in the above-referenced matter respectfully request an extension of time of sixty days, to April 2, 2007, to complete fact discovery. An extension is necessary because of difficulties in scheduling witnesses for their depositions during the past holiday season. Further, Plaintiffs were out of the country for an extended period of time causing delays in their responses to Defendants discovery requests. Nevertheless, Plaintiffs have only one more deposition to take, and Defendants intend to complete their depositions within the next two months. Currently, the fact discovery deadline is January 30, 2007, and a settlement conference is scheduled for February 14, 2007, at 2:00 p.m. This is Defendants' second request for an extension of the fact discovery deadline in this case. The Court granted Defendants' first request on June 29, 2006, and counsel for Plaintiffs have consented to this request.

Respectfully submitted,

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